

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)**

IN RE:

Debbie Edwards
DEBTOR.

CHAPTER 13

CASE NO.: 19-16421-jkf

HEARING: January, 8, 2020 at 9:30AM

LOCATION: Courtroom #3

**INTERSTATE TD INVESTMENTS LLC'S OBJECTION TO THE CONFIRMATION
OF THE DEBTORS' CHAPTER 13 PLAN**

Movant, Interstate TD Investments LLC ("Movant"), by its attorneys Hill Wallack LLP, hereby objects to the confirmation of the Debtor's Chapter 13 Plan as follows:

1. Interstate TD Investments LLC, is the holder of a Note and Mortgage on real property owned by Debbie Edwards ("Debtor") at 2824 Walnut Hill, Philadelphia, PA 19152(the "Property").

2. On or about October 11, 2019, Debbie Edwards ("Debtor") filed a petition for relief under the Chapter 13 of the Bankruptcy Code in the United States Bankruptcy Court.

3. The Debtor's pre-petition arrears is estimated at \$22,268.16

4. Debtor proposes to pay the Movant \$20,000.00 for pre-petition arrearage.

5. The Plan as proposed does not provide for Movant's claim, and therefore, the Plan is not confirmable as the Debtor's options are to either provide for payment pursuant to 11 U.S.C. §1325(a)(5)(B)(ii) or surrender pursuant to 11 U.S.C. §1325(a)(5)(C). The Plan does neither, and therefore, the Plan does not satisfy the confirmation requirement of 11 U.S.C. §1325(a)(1).

6. If the Plan is confirmed, the Movant may suffer irreparable injury, loss, and damage.

WHEREFORE, Interstate TD Investments, LLC, Movant, respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan and enter a bar on any further filings of Chapter 13 by the Debtor.

Respectfully submitted,

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